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**REMEDIAL INVESTIGATION/FEASIBILITY  
STUDY (RI/FS) WORK PLAN**

08/24/87

**DOE-332-87  
DOE/USEPA  
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LETTER**

bcc w/o att.s

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Charlie Seehorn, CC-10, ORO  
Greg Fess, GC-21, FORS  
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Department of Energy  
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August 24, 1987  
DOE 332-87

G-000-303.10

Ms. Catherine McCord  
Environmental Review Branch  
Planning and Management Division  
US-EPA  
Region V - 5ME-12  
230 S. Dearborn Street  
Chicago, Illinois 60604

**REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) WORK PLAN**

Dear Ms. McCord:

Reference is made to Valdas Adamkus's June 24, 1987 letter to me on the above subject.

DOE has reviewed USEPA-5 and Ohio EPA comments on the RI/FS Work Plan, and our responses are provided with this letter. DOE requests formal USEPA-5 authorization to proceed with remaining RI/FS tasks based on the (1) December 19, 1986 Work Plan (supplemented on January 30, 1987), and (2) resolution to USEPA-5 and Ohio EPA comments as presented in this letter. Any further delay in formal USEPA-5 approval will result in unnecessary additional resources to complete the RI/FS, and the Record of Decision will be delayed beyond the current schedule of early 1990.

The referenced letter identified four (4) general deficiencies with the Work Plan. These deficiencies (paraphrased) and our responses are as follows:

1. Deficiency - DOE must develop a mechanism for integrating past data into the RI/FS.

Response - At a meeting on July 22, 1987 at the FMPC between USEPA-5, Ohio EPA, DOE and DOE contractors, the issue of using past data in the RI/FS was discussed. Briefly, it was DOE's position that past data would be used provided the data was validated to USEPA-5's satisfaction.

2. Deficiency - Data collected under the RI/FS should meet the requirements Section 121 of SARA.

Response - All data collected by DOE will meet the requirements of Section 121 of SARA.

3. Deficiency - An adequate onsite and offsite characterization study must be performed.

Response - As stated in the Work Plan, a phased approach to the onsite investigation is planned for the RI/FS. During the July 22, 1987 meeting discussed above DOE agreed to propose to USEPA-5 an offsite groundwater monitoring program consisting of 10-15 monitoring wells. In addition, DOE agreed to analyze 10 additional wells for HSL parameters. Both proposals are provided with this letter.

4. Deficiency The Work Plan is missing vital elements specified in the RI/FS statement of work (SOW).

Response - DOE has addressed specific USEPA-5 and Ohio EPA deficiencies in the Work Plan that were outlined in the June 24, 1987 letter. On August 4, 1987, both USEPA-5 and Ohio EPA's office was briefed on DOE's plans to conduct a comprehensive study of radiological impacts on the offsite population around the FMPC. This study is being conducted with participation from the Center for Disease Control, USEPA, The State of Ohio, and other regulatory agencies. This study will be performed outside the FFCA; however, it will be accomplished in such a manner as to satisfy the requirements of the FFCA in general, and the RI/FS in particular.

During the July 22, 1987 meeting, USEPA-5 was informed of DOE's intent to revise the Work Plan in two segments. First, a comment response volume was to be issued by August 24, 1987. This comment response volume is provided in the four (4) attachments to this letter which are described as follows:

- o Attachment 1 - Response to specific USEPA-5 comments.
- o Attachment 2 - Response to specific Ohio EPA comments.
- o Attachment 3 - Revisions to the RI/FS Work Plan volume submitted to USEPA-5 on December 19, 1986.
- o Attachment 4 - Change pages to the Work Plan supporting documents submitted to USEPA-5 on January 30, 1987.

A revised RI/FS Work Plan incorporating all agreed-upon changes will be issued within 45 days of USEPA-5 approval of the Work Plan. A response package on USEPA and Ohio EPA comments relative to Task 1 - Description of Current Situation is planned for November 1987.

We look forward to your approval of the RI/FS Work Plan.

Sincerely,

  
James A. Reafsnider  
Site Manager

DP-84:Collier

Attachments (2):As stated

cc w/atts.

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